

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Shabon Terese Chadwick

Case: 2:23-mj-30245

Assigned To : Unassigned

Assign. Date : 6/10/2023

CMP USA V CHADWICK (LH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 5, 2023 and June 9, 2023in the counties of Wayne in theEastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 2252A(a)(2)

Distribution/Receipt of child pornography

18 U.S.C. § 2252A(a)(5)(B)

Possession of child pornography

This criminal complaint is based on these facts:

see attached affidavit.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: June 10, 2023City and state: Ann Arbor, Michigan*Complainant's signature*Matthew Hughes, Special Agent (FBI)*Printed name and title**Judge's signature*Hon. Anthony P. Patti, United States Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR COMPLAINT
AND ARREST WARRANT**

I, Matthew R. Hughes, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I have been employed as a Special Agent of the FBI since October 2019 and am currently assigned to the FBI Detroit Division. While employed by the FBI, I have investigated federal criminal violations related to Internet fraud, computer intrusions, and the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations.

2. I have received training in the area of child pornography and child exploitation and have reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. §§ 2252A. I am authorized by law to request a arrest warrant.

3. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **Shabon Terese Chadwick** (date of birth

**) for violations of: 18 U.S.C. § 2252A(a)(2)(A) and 2252A(a)(5)(B) (Possession, Receipt and Distribution of Child Pornography.)

4. The statements contained in this affidavit are based in part on information provided by U.S. federal law enforcement agents, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents/officers, information gathered from investigative sources of information, and my experience, training, and background as a Special Agent. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that **Chadwick** has violated Title 18 U.S.C. § 2252A(a)(2)(A) and 2252A(a)(5)(B).

5. On or about June 7, 2023, The FBI Detroit Field Office received information from a complaining witness (CW1) previously known to the FBI that he was on a website called Mocospace and identified an individual who posted that they liked “taboo.” The individual used the username “nastyfreako39”.

6. CW1 stated they then added nastyfreako39 on Kik. Kik is a communication platform that allows individuals to send text messages, photos, videos, and voice messages to each other. An individual is able to add people they do not know or have had previous contact with.

7. CW1 stated that during the conversation the other user, identified by screen name nastyfreako39 sent CW1 five videos of unknown individual engaged in sex with a child who appeared to be a toddler. Several images depicting a nude toddler were also included in the conversation. The images and videos appeared to depict different toddlers. CW1 provided the videos to the FBI.

8. On June 9, 2023, I reviewed the videos and images sent to CW1 by user nastyfreako39. The videos depicted males who appeared to be adults engaged in sex with toddlers. The videos appear to depict different children in each video. The age of the toddlers are believed to be around three years old. The images depict a young female undressing with adult male genitalia visible in the photos. The female appears to be around three years old.

9. An administrative subpoena was served to Kik on June 7, 2023. A return was received on June 9, 2023. The email address associated with the account was chadwickshabon*@gmail.com. The IP address used to log into the account several times per day between May 9, 2023 and June 6, 2023 was 68.34.77.87. The IP address is serviced by Comcast.

10. An exigent request to Comcast was submitted on June 9, 2023. Comcast provided a return on the same day. The billing address for the IP address was an address in Romulus, Michigan. The account was registered to Shabon Chadwick.

11. Driver's license information for Shabon Chadwick obtained from the Michigan Secretary of State identified the address as the same address in Romulus, Michigan discussed in paragraph 10.

12. On June 9, 2023, Romulus Police Department provided a police report dated March 10, 2022. According to the police report Romulus Police Department received a complaint that they had contacted Chadwick at the same address in Romulus, Michigan, and identified "inappropriate images" of a young female that they believed to be known to Chadwick ("MV1"). The report did not describe the images.

13. The same complaint also identified text messages in Chadwick's phone that were sexual in nature and were about MV1 but did not provide further details.

14. In a forensic interview of Chadwick's another minor female known to Chadwick ("MW1"), MW1 stated that Chadwick uses texting apps to send sexual messages to others about MV1. Chadwick will either pretend to be MV1 or will message males and tell them what she wants them to do to MV1 sexually. MW1 stated that had seen inappropriate images of MV1 on Chadwick's phone. MW1 did not describe the images.

15. On June 9, 2023, MSP provided two tips they had received for the same IP Address associated with Chadwick's residence in Romulus, Michigan. The first tip, received on February 24, 2022 from Snapchat Inc provided information that a

video was uploaded by user chanteljone****. The video depicted a nude toddler-aged female in a bathroom. No context was provided for the video. The video met the federal definition of child sexual abuse material.

16. The second tip, received on June 27, 2022 from Kik provided information that user rainbon39 uploaded a video to Kik. The video depicted a toddler-aged female engaged in vaginal sex with an adult male. The faces of the toddler and male were not visible. The email address associated with the account was shaychad**@gmail.com.

17. On or about June 9, 2023 a federal search warrant was executed at the address referenced in paragraphs 10 and 11 in Romulus, Michigan. Shabon Chadwick was present when the search warrant was executed.

18. In a recorded interview Chadwick admitted to distributing images and videos she knew to be child pornography through different social media and messaging applications such as Kik and Telegram.

19. Chadwick admitted to obtaining clothed photographs of MV1 and distributing them online through messaging applications such as Kik and Telegram. Chadwick would then engage in sexual conversations about MV1 and other individuals known to her and have unknown users describe to Chadwick what sexual encounters they wanted to have with MV1 and others known to her.

20. A phone was seized from Chadwick's vehicle on the premises the address in Romulus that had been on her person when agents observed her initially. Within the contents of the phone over 50 images and videos depicting child sexual abuse material were identified in the "Trash" section of the Photos application. The same photos and videos provided to the FBI by CW1 were identified in the "Trash" section.

21. Within the Telegram application on the phone multiple conversation threads were identified of Chadwick engaged in sexually explicit conversations with unknown users. In many of the conversation threads images and videos depicting child sexual abuse material were shared and received.

II. CONCLUSION

22. 15. Based on the foregoing, there is probable cause to believe **Shabon Terese Chadwick** has violated: 18 U.S.C. § 2252A(a)(2)(A) and 2252A(a)(5)(B) (Receipt, Possession and Distribution of Child Pornography.)

Respectfully submitted,



Matthew R. Hughes, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
And/or by reliable electronic means.



HON. ANTHONY P. PATTI
UNITED STATES MAGISTRATE JUDGE

Date: June 10, 2023